

November 17, 2021

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**Re: Summary of General Public Comments to Draft DOE 5-Year Plan**

- References:
1. "The Hanford Site 5-Year Plan," Revision 3 Draft (10-11-2021).
  2. HAB Advice #309, "FY2023 Hanford Cleanup Priorities," dated March 17, 2021.

Dear Mr. Vance, Mr. Bowen, and Mr. Einan,

DOE presented the Draft Revision 3 of their Hanford Site 5-Year Plan (Reference 1) to the Hanford Advisory Board (HAB) and to the general public at an October 20, 2021 scheduled meeting. During that meeting, participants had the opportunity to ask DOE representatives clarifying questions in order to assure an understanding of the materials. Also, during a follow-on roundtable discussion HAB and general public participants attending the meeting had an opportunity to discuss concerns and issues relative to the 5-Year Plan presented by DOE. DOE representatives indicated during the meeting that DOE wanted and welcomed feedback relative to the 5-Year Plan by November 22, 2021.

Since the DOE 5-Year Plan primarily falls within the specific purview of the HAB Budgets and Contracts Committee (BCC), a formal Issue Management (IM) team was formed at the direction

of the HAB Executive Issues Committee (EIC) to determine how best concerns and issues voiced in discussion at the 5-Year plan meeting could be provided to DOE in a meaningful manner.

In the October 20 public meeting DOE urged the participants to complete a pre-established survey concerning the 5-Year Plan. However, after reviewing the survey we believe that it is not an adequate mechanism to identify the concerns and issues raised during the meeting discussions. It was decided that a formal letter would be a more effective means to provide a summary of these comments.

The comments and discussion provided herein have been developed from a review and summary of the meeting transcript. Unfortunately, the limited response time for providing comments to DOE prevented the possibility of establishing consensus within the HAB. Therefore this cannot be considered as an official HAB product, and the attached comments are being submitted as "general public" comments for DOE consideration.

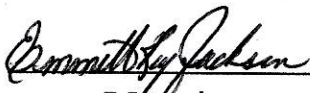
The comments raised during the 5-Year Plan meeting are presented as falling into three categories:


- I. Comments related to Format/Structure/Timing Issues,
- II. Comments related to Specific Cleanup Activity Issues, and
- III. Comments related to Unexpected Events, Emergencies, and Contingency Funding


Thank you for the opportunity to provide this input on the Draft DOE 5-Year Plan prior to finalizing it for issuance.

Sincerely,

HAB BCC IM Team:

  
E.R. Jackson

  
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DOE 5-Year Plan Contact Email  
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B. Harp (DOE) – Per instruction,  
request G.Younger to forward.

B. Holland

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D. Reeploeg (TRIDEC)

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B. Stickney (DOE) – Per instruction,  
request G.Younger to forward.

B. Suyama

G. Younger (DOE)

S. Wiegman

# **Attachment**

## **Summary of General Public Comments to Draft DOE 5-Year Plan (Revision 3)**

### **I. Comments Related to Format/Structure/Timing Issues:**

- a) The time allowed to formally respond with comments to this document was limited to 1 month after the plan was presented to the HAB and general public. The public should be part of the development of this 5-Year Plan much earlier in the process.
- b) The 5-Year Plan does not address indirect Hanford activities such as HAB support, public engagement activities, workforce issues, etc. Since these activities must also be funded through the overall Hanford budget, and are critical to Hanford cleanup success, they should be referenced in the Plan.
- c) Many of the 5-Year Plan activities appear to be related to infrastructure issues and lower-level supporting activities leading to more significant milestones. To better distinguish the importance of all activities, we suggest having entries in the 5-year Plan labeled as:
  - [C] Critical Cleanup Activity
  - [S] Supporting Activity
  - [I] Infrastructure Activity
- d) It would be helpful for DOE to show on the 5-Year Plan a parenthetical note for each activity identifying it by its project breakdown structure (PBS) #.
- e) We suggest DOE consider using PBS titles/numbers to group 5-Year Plan activities instead of using the current three categories of Tank Waste/Central Plateau/River Corridor. Because DOE will show appropriated funding for the Hanford Site by PBS, listing work priorities by PBS makes it much easier to relate funding to specific work priorities.
- f) The Survey form provided by DOE (via a link) is not adequate to record specific concerns and issues related to the 5-Year Plan.
- g) Public participation in finalizing this 5-Year Plan is critical to its acceptance and success. Scheduling a public meeting in the morning of a weekday, as was done for this October 20 meeting on the 5-Year Plan, is not conducive for broad public participation. Any important meeting that requires public participation should be scheduled during

weekday evening times. The HAB Public Involvement Committee (PIC) could provide a focus for this involvement.

- h) It would be beneficial to provide information documents (and possibly sub-bullets to each of the critical cleanup activities) which elaborate on the brief text describing each critical work item in the 5-Year Plan, either as part of the Plan itself or separately. This information should provide a non-technical description on how the 5-YrYear Plan activities support the long-term Hanford cleanup objectives to facilitate better understanding by the general public on the cleanup process and progress.

## **II. Comments Related to Specific Cleanup Activity Issues:**

- 1) There are no specific priority tasks identified in the Plan to address the recent B-109 Tank leak. We believe some actions must be identified in the 5-Year Plan to address this leak. In addition, DOE should develop an emergency plan to address future leaks in single shell tanks (SST). The HAB is finalizing formal Advice on this subject that will be presented for approval/issuance at the December 15/16 HAB meeting.
- 2) Why does the 324 Building have no priority activity identified on the 5-Year Plan in 2024? The schedule timeline is not aggressive enough, considering that this activity is listed by the HAB as a critical cleanup activity in Reference 2. If work is ongoing for this task in FY2024, it is suggested that the 5-Year Plan include a note to indicate this effort.
- 3) Why does completion of the Waste Encapsulation and Storage Facility (WESF) construction have no priority activity identified on the 5-Year Plan in 2023? The schedule timeline is not aggressive enough, considering that this activity is listed by the HAB as a critical cleanup activity in Reference 2. If work is ongoing for this task in FY2023, it is suggested that the 5-Year Plan include a note to indicate this effort.
- 4) Due to the upcoming transition to operations of the Direct Feed Low Activity Waste (DFLAW) facility, a significant increase in funding will be required for this operation. Is this increase expected to come from an increase in the overall Hanford budget to address operations, or will those operational funds have to be taken from other planned cleanup activities onsite?
- 5) The dates associated with the groundwater cleanup project seem to have slipped in this 5-Year Plan. Please adjust or clarify on the Plan.
- 6) Required preparation activities for waste shipments of transuranic materials off of the Hanford site should specifically be addressed in the 5-year plan.

### **III. Comments Related to Unexpected Events, Emergencies, and Contingency Funding**

A number of comments at the public meeting addressed the need for available emergency funding to cover unanticipated cleanup issues and emergency events, noting that such events occur with regularity. Although funding levels are not at issue in the development of the DOE 5-Year Plan, we have nevertheless chosen to identify this concern to DOE with the three recommendations given below. We believe these recommendations should be addressed by DOE in future 5-Year Plan presentations particularly since the Hanford Site is moving toward a 24/7 operations mode in which continuity of operations will become paramount in importance.

- 1) It is recommended that DOE identify a portion of the appropriated cleanup funds each year to address unanticipated issues and emergencies. This would avoid the disruption of ongoing priority cleanup activities and continuity of operations by having to divert funds from them to address emergent issues.
- 2) It is recommended that if not needed, these emergency funds be used to accomplish a pre-planned list of additional cleanup activities. This approach appears to fit well within the current End-State Indefinite Delivery/Indefinite Quantity (IDIQ) contracting approach now employed by DOE for Hanford work, which allows acceptance of specific task orders to direct cleanup activities.
- 3) It is recommended that in future 5-Year Plan public presentations DOE explain how it plans to address unanticipated events and emergencies per the recommendations above.